

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CCC INTELLIGENT SOLUTIONS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:18-cv-07246</b>
<b>v.</b>	)	
	)	<b>Hon. LaShonda A. Hunt</b>
<b>TRACTABLE INC.,</b>	)	
	)	<b>Hon. Keri L. Holleb Hotaling</b>
<b>Defendant.</b>	)	

**DEFENDANT TRACTABLE INC.’S UNOPPOSED  
MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 26.2 of the U.S. District Court for the Northern District of Illinois and the Protective Order governing this case, Defendant Tractable Inc. (“Tractable”) moves this Court for an order permitting the filing under seal of portions of Tractable’s opposition (“Opposition”) to the Motion to Compel (“Motion”) filed by Plaintiff CCC Intelligent Solutions Inc. (“CCC”) and certain accompanying exhibits. In support of this motion, Tractable states as follows:

1. On November 1, 2022, the Court entered an Agreed Protective Order (“Protective Order”) to protect confidential information produced in the course of discovery. *See* ECF No. 110.
2. Pursuant to Paragraphs 5(b) and 6(b) of the Protective Order, the parties and their counsel are prohibited from disclosing or permitting the disclosure of Confidential or Highly Confidential Information to any third person or entity, with limited exceptions such as disclosures to this Court and to the parties’ outside counsel of record.
3. Portions of Tractable’s Opposition and accompanying exhibits, which will be provisionally filed under seal, contain information designated as “Confidential Information” and “Highly Confidential – Attorneys’ Eyes Only” by CCC and by Tractable.

4. Specifically:

- a. Exhibit A to Tractable's Opposition contains correspondence between counsel that contains and/or reveals information that Tractable or CCC has currently designated as "Confidential Information" and "Highly Confidential Information – Attorneys' Eyes Only."
- b. Exhibit B to Tractable's Opposition (CCC Intelligent Solutions Inc.'s Responses and Objections to Tractable Inc.'s Second Set of Interrogatories (Nos. 9-15)) has been designated by CCC as containing "Highly Confidential Information – Attorneys' Eyes Only." Given the requirements of the Protective Order, Tractable moves to seal this Exhibit.

5. Tractable will file a redacted version of its Opposition concurrently with this Motion for Leave to File Under Seal.

6. Tractable will redact portions of the Opposition that reference information that was sealed in connection with CCC's Motion, including exhibits to CCC's Motion, consistent with the Court's order on October 3, 2024 granting CCC's Motion for Leave to File Under Seal. *See* ECF No. 214.

7. Tractable will also redact portions of its Opposition that reference any information in the exhibits to the Opposition that the parties have designated as "Confidential Information" or "Highly Confidential Information – Attorneys' Eyes Only."

8. Tractable conferred with counsel for CCC, and counsel for CCC indicated that CCC does not oppose the relief requested in this motion.

9. Pursuant to Paragraph 8 of the Protective Order and Local Rule 26.2(b), Tractable requests leave to file its Opposition and accompanying exhibits under seal.

WHEREFORE, Tractable respectfully requests that this Court grant this Motion for Leave to File Under Seal.

DATED: October 18, 2024

Respectfully submitted,

/s/ Lazar P. Raynal

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*Counsel for Defendant Tractable Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2024, I caused the foregoing to be filed using the Court's electronic filing system which provides service to all counsel of record.

/s/ Lazar P. Raynal  
Lazar P. Raynal